

**Sent:** Tuesday, December 14, 2004 12:50 PM  
**To:** NIEHS ICCVAM  
**Subject:** Draize rabbit eye-irritation test

12-14-04

Dr. William Stokes, Director  
NTP Interagency Center for the Evaluation of Alternative Toxicological Methods  
National Institute of Environmental Health Sciences  
P.O. Box 12233, MD EC-17  
Research Triangle Park, NC 27709

Dear Dr. William Stokes:

I am writing to you to implore the U.S. Interagency Coordinating Committee to accept and implement alternative tests of chemicals instead of the extremely cruel and inhumane animal tests currently used.

While most European countries have accepted the results of these alternative tests since the mid 1990s for the purpose of identifying and classifying chemicals that cause severe eye irritation, ICCVAM has taken the incomprehensible position that, regardless of the result of a non-animal test, "confirmatory" testing should be carried out on animals. According to ICCVAM, even chemicals that exhibit corrosive or severely irritating properties in vitro should still be dripped or smeared into rabbits' eyes Ö just to be sure!

Please immediately implement the following procedures for the testing of chemicals:

ï Follow the example set by European countries that accept the results of in vitro methods, alone or in combination, to classify severely irritating and corrosive chemicals, and eliminate proposals for "confirmatory" testing on animals.

ï Background-review documents should clearly address the limitations of the current animal test for eye irritation, including its subjectivity, reproducibility, and its over-and under-prediction rate. ICCVAM should not presume to "validate" a non-animal method against an animal test that has never been properly validated itself.

The United States should set an example for the rest of the World that life is not disposable; animals should not be tortured for the sake of outdated "procedures".

Thank you for your attention to this extremely important matter.

Respectfully,  
Mara Rigge